

Atty. Dkt. No. 200209331-1

REMARKS

This Reply is in response to the Office Action mailed on February 9, 2006. In view of the following remarks, reconsideration and allowance of the pending claims is requested.

I. Claim Objections

Paragraph 1 of the Office Action objected to claims 13-14 and 16-17 because of alleged informalities. In particular, the Office Action states that "[c]laim 13 recites a printing device in the preamble but does not recite printing means." Applicants are amending the preambles of these claims to cancel the term "printing" and submit that the objections to these claims are overcome. Withdrawal of these objections is requested.

II. Rejection of claims 1-6, 8-9, 12-14, and 16-17

Paragraph 4 of the Office Action rejected claims 1-6, 8-9, 12-14, and 16-17 as being unpatentable under 35 USC § 103(a) over Endo et al. in view of Ohno et al. Applicants traverse these rejections as applied to the amended claims.

A. Claims 1-4, 6, 8, and 12

Applicants submit that the Office Action fails to establish a *prima facie* obviousness of claim 1 on the basis that Endo et al. in view of Ohno et al. do not teach or suggest "identifying the composite media" where the composite media includes a "media sheet with at least one laminate material sheet" as required by claim 1. ("To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art." MPEP 2143.03). The Office Action does not make specific reference to the claim element "identifying the composite media." With respect to Endo et al., an operating mode is user-selected rather than "based on the identified composite media" and, as such, does not disclose "identifying the composite media." Ohno et al. does not disclose "laminating" or use of "composite media" that includes a "media sheet with at least one laminate material sheet" and, as such, fails to disclose

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"identifying the composite media." Because Endo et al. in view of Ohno et al. do not teach "identifying the composite media" where the composite media includes a "media sheet with at least one laminate material sheet" as required by claim 1 the Office Action fails to establish *prima facie* obviousness of claim 1. Applicants submit that this rejection of claim 1 is therefore improper and request withdrawal of this rejection.

Concerning claim 1, Endo et al. in view of Ohno et al. also fail to disclose "adjusting a characteristic of the toner fuser of the printing device based on the identified composite media" as required by claim 1. Indeed, because neither Endo et al. nor Ohno et al. disclose "*identifying the composite media*", neither of these references teaches "adjusting a characteristic of the toner fuser of the printing device based on the identified composite media" (emphasis added) as recited in claim 1. Withdrawal of the rejection of claim 1 is requested for this additional reason.

Claims 2-4, 6, 8, and 12 depend upon claim 1 and are allowable for at least the same reasons as claim 1 is allowable. Withdrawal of these rejections is requested.

B. Claim 5

Claim 5 is amended to recite "adjusting the pressure exerted by the toner fuser based on identifying the media sheet and the laminate material sheet" and Applicants submit that amended claim 5 is non-obvious over Endo et al. in view of Ohno et al. In particular, neither Endo et al. nor Ohno et al. disclose adjusting pressure exerted by a toner fuser "*based on identifying the media sheet and the laminate material sheet*." Indeed, with respect to Endo et al., an operating mode is user-selected. With respect to Ohno et al., no reference is made to a "laminate material sheet" or to basing adjustment of a fuser pressure based on identification of two items, namely "a media sheet" and "a laminate material sheet." Consequently, Endo et al. in view of Ohno et al. do not disclose all of the elements of claim 5. As such, Applicants submit that claim 5 is allowable over these references. Withdrawal of this rejection is requested.

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C. Claim 9

Applicants submit that the Office Action fails to establish a *prima facie* obviousness of claim 9 on the basis that Endo et al. in view of Ohno et al. do not teach or suggest "wherein receiving the media sheet and at least one laminate material sheet includes receiving the media sheet and at least one laminate material sheet from an **automatic feed tray** of the printing device (emphasis added)." In this regard, regarding Endo et al., the Office Action states "The document and laminate sheet materials are **manual feed tray** [sic] and bypass the transfer mechanism before being fused in the toner fuser (column 11, lines 25-53) (emphasis added). Indeed, Endo et al. fails to disclose "an automatic feed tray" as set forth in claim 9. Rather, Endo et al. discloses a manual feed tray (see Endo et al. Abstract "A laser printer having a **manual insertion port** through which a pair of lamination sheet members interposing therebetween a printed card is insertable into a sheet feed passage). Ohno et al. does not teach lamination. As such, because neither Endo et al. nor Ohno et al. disclose "wherein receiving the media sheet and at least one laminate material sheet includes receiving the media sheet and at least one laminate material sheet from an **automatic feed tray** of the printing device (emphasis added)" as required by claim 9, the Office Action fails to establish *prima facie* obviousness of claim 9. Withdrawal of this rejection is requested.

D. Claims 13, 14, 16, and 17

Applicants submit that the Office Action fails to establish a *prima facie* obviousness of claim 13 on the basis that Endo et al. in view of Ohno et al. do not teach or suggest a printing device that having a media-transport path that "includes a selectively operable bypass of the image-transfer mechanism" as recited in claim 13. In this regard, the Office Action makes reference to Column 11, lines 25-53 of Endo et al. Applicants submit that this section of Endo et al.

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does not teach a media-transport path that "includes a selectively operable bypass of the image-transfer mechanism. Rather, Endo et al. discloses that "the lamination sheets 13, 14 retaining therein the paper card 106 are promptly fed to the process unit 3 as soon as the leading edge, i.e., fuse-bonding edge 100 reaches the resist rollers" (Col. 11, lines 60-63). Endo et al. discloses that the "the process unit 3 includes the photosensitive drum 23, a transfer roller 25...." As such, Applicants submit that Endo et al. does not teach or suggest bypass of the image-transfer mechanism. Ohno et al. also fails to disclose bypass of the image-transfer mechanism. Withdrawal of this rejection is requested.

Claims 14, 16, and 17 depend upon claim 13 and are allowable for at least the same reasons as claim 13 is allowable. Withdrawal of these rejections is requested.

III. Rejection of claims 10 and 11

Claims 10 and 11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Endo in view of Ohno, in view of Fukushima. Applicants traverse these rejections. As amended, claim 10 recites "displaying instructions on a device display, the instructions defining how to configure the printing device to effect lamination" among other elements.

Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. See MPEP 2143.01 ("The prior art must disclose the desirability of the claimed Invention.") Here, there is no suggestion or motivation to modify Endo with the teachings of Fukushima.

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In particular, the Office Action proposes combining the teachings of Endo with the teachings of Fukushima in order to achieve manual feed instructions on the device display. However, as Endo does not disclose a user-configurable lamination mode, there is no teaching or suggestion to provide a display with instructions regarding how to configure the lamination mode. Accordingly, there is no suggestion or motivation to combine the references as the Office Action proposes. Furthermore, even if the combination were made, the resulting method would merely provide for adjustments due to non-standard media length and width, characteristics which would not impact lamination configuration as recited in amended claim 10. Claim 10 thus is allowable over Endo, Ohno, and Fukushima, and the rejection of claim 10 under 35 U.S.C. § 103(a) should be withdrawn. Claim 11 depends from claim 10, and thus is allowable for at least the same reasons as claim 10.

IV. Conclusion.

Applicants believe that the present application is in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested. The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 08-2025. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 08-2025. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 08-2025.

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Respectfully submitted,
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